

Formal Planning Submission Observation

TO: An Coimisiún Pleanála

RE: Planning Application for the Proposed Lissinagroagh Wind Farm, Dough Mountain, Co. Leitrim & Associated works

Case Reference: PAX12.324290

ACP Case Number: 324290

Proposed Development: Lissinagroagh Wind Farm, Dough Mountain, Co. Leitrim & Associated works

DEVELOPMENT FRAMEWORK: Strategic Infrastructure Development (SID)

OBJECTORS DETAILS:

Names: Joanne Fox, Noel Fox, and family

Address: Cartrongibbagh, Manorhamilton, Co. Leitrim

Eircode: F91X210

joeycost@gmail.com

Status: Impacted Local Residents & Primary Stakeholders

As residents of Cartrongibbagh, we write this submission to formally object to the granting of planning permission for the proposed 14-turbine Lissinagroagh Wind Farm on Dough Mountain. We fully support Ireland's international commitments to renewable energy and climate targets, and using wind energy, these statistical goals must not be achieved by sacrificing human health, destroying protected ecosystems, or decimating rural communities.

PERSONAL IMPACT

Our residential property (Eircode: F91X210) is located approximately 900 meters from the active 3-turbine Faughary wind farm. This proximity gives us direct, daily experience with the realities of wind turbine noise.

Existing Sleep Disturbance: The low-frequency aerodynamic "whooshing" from the current three small turbines is highly audible at nights when the turbines are active. Because our bedroom windows, and childrens bedroom windows directly face these turbines, our family already experiences sleep disruption and elevated stress.

If three standard turbines currently cause sleep disturbance, the introduction of 14 industrial mega-turbines (180 meters in height) will create an overwhelming, inescapable acoustic burden.

Standard noise impact assessments assume flat, frictionless terrain. They completely fail to account for the unique topography of North Leitrim. The surrounding valleys act as a natural amphitheater, trapping, reflecting, and magnifying nighttime blade noise directly toward our home.

3. FUNDAMENTAL MISINTERPRETATION OF THE LEITRIM COUNTY DEVELOPMENT PLAN (2023–2029)

The applicant's reliance on the "Areas of Search" identified by the RPS Group survey in the Leitrim County Development Plan relies on a flawed, highly selective reading of planning policy.

Flawed Definition of "Available" Areas

In planning framework terminology, a designation of an area as technically "available" serves strictly as a preliminary filter. It indicates that an area possesses the raw physical criteria (e.g., sufficient wind speeds) to be considered for assessment. It is not an automatic green light for development.

A site is only truly available if it can satisfy all overriding local constraints, including ecology, landscape designations, and proximity to human settlements.

Contradiction of the Council's Own Capacity Studies

The developer selectively quotes mapping data while entirely ignoring the explicit conclusions of the RPS Landscape and Visual Capacity Study commissioned by the Council. This study formally concludes that North Leitrim's uplands have "very limited capacity to absorb future proposed development in the form of wind turbines" due to their unique, fragile scenic value.

Material Contravention of Landscape Protection Overlays

Dough Mountain is explicitly designated under the Development Plan as an Area of High Visual Amenity (AHVA B3) due to its exposed, unique, and pristine beauty. Furthermore, the massive scale of the project directly violates and breaches the protected views and prospects of the neighboring Arroo Mountain range (AHVA B1). Active landscape protection policies must take precedence over raw technical availability. A site cannot be deemed "available" for 180-meter heavy industrial structures when active local policy mandates the preservation of that exact panoramic horizon.

4. CONTRADICTION OF EUROPEAN ENVIRONMENTAL DIRECTIVES

Granting planning permission for this development would put the Irish State in direct, actionable breach of its statutory obligations under multiple European Environmental Directives:

I. EU Habitats Directive (92/43/EEC)

Downstream Ecological Risk: Dough Mountain serves as a critical hydrological catchment. The extensive excavation and ground disruption required for 14 massive turbine bases will release heavy silt, peat, and chemical pollutants into waterways directly connected to protected European sites—specifically the Lough Gill SAC and Lough Melvin SAC.

Failure of Appropriate Assessment: Under Article 6(3) of the Directive, planning permission can legally only be granted if it is established beyond reasonable scientific doubt that the project will not adversely affect the integrity of a European site. Given the highly unstable, volatile nature of upland blanket bog, this absolute scientific certainty cannot be guaranteed.

II. EU Water Framework Directive (2000/60/EC)

Violation of the Non-Deterioration Clause: Member states are legally mandated to prevent the deterioration of all surface and groundwater bodies.

Threat to Source Waters: The massive scale of tree-felling, soil compaction, and the pouring of thousands of tons of concrete foundations will permanently disrupt natural drainage channels. This creates an unacceptable risk of heavy sedimentation, directly threatening the "good status" of local river basins and public drinking water sources.

III. EU Environmental Impact Assessment (EIA) Directive (2011/92/EU)

Underestimation of Peat Instability: The developer's Environmental Impact Assessment Report (EIAR) fails to properly account for the severe risk of peat-slides and landslides unique to North Leitrim's geology.

Unresolved Historical Precedent: Planning permission in this region has previously been denied due to the definitive risk of catastrophic landslides. It is a logical and legal contradiction to suggest that a project of an even larger, heavier industrial scale is suddenly safe to construct on the same unstable geology. Proceeding without a flawless risk model violates the strict Precautionary Principle mandated by the EIA Directive.

IV. EU Birds Directive (2009/147/EC)

Threat to Protected Species: The upland bog and forestry of Dough Mountain are documented foraging and nesting grounds for highly vulnerable, red- and amber-listed bird species, including the Hen Harrier, Curlew, and Merlin.

Displacement and Collision Risk: The introduction of 180-meter-tall rotating industrial structures will cause permanent habitat displacement and present a critical, fatal collision risk, directly undermining the Directive's core objective to sustain wild bird populations.

5. DESTRUCTION OF VITAL CARBON SINKS & NEGATIVE CARBON PAYBACK

The proposed development directly undermines the global climate policies (such as the Paris Agreement) cited in the developer's own planning statement. Excavating a pristine peatland environment creates an immediate carbon debt that compromises the project's supposed green benefits.

Massive Peatland Destabilization: The developer's EIAR reveals that the total landholding spans 1,096 hectares, with the immediate application site covering 389 hectares. Of this site, 311 hectares comprise highly vulnerable peatbogs, coniferous forestry, and transitional scrub.

Release of Locked CO₂: Excavating, draining, and pouring concrete foundations across these 311 hectares will actively release thousands of tonnes of ancient, safely sequestered carbon back into the atmosphere.

The "Carbon Payback" Deficit: Because peatlands take thousands of years to naturally form, the immediate carbon footprint generated by destroying this bog, clearing forestry, and

manufacturing/transporting 14 massive 180-meter turbines creates a severe "carbon payback time." For its first several years of operation, this wind farm will simply be trying to offset the heavy environmental damage caused by its own construction. Protecting intact peat bogs is legally recognized as a critical pillar of national and EU carbon-sequestration strategies.

6. DESTRUCTION OF THE LOCAL ECONOMY & TOURISM

Manorhamilton and its surrounding glens rely heavily on green eco-tourism, hillwalking, and the untouched, wild beauty of the North Leitrim mountains for economic survival.

Visual Industrialization: Turbines standing 180 meters tall will utterly dominate and scar an iconic, pristine horizon, permanently turning a high-nature-value landscape into a heavy industrial zone.

Eradication of "Lovely Leitrim" Scenic Value: Tourism branding for this county relies entirely on unspoiled nature. Ruining this landscape means walking trails, local guest accommodations, and rural businesses lose their primary appeal. Automated industrial assets provide no long-term local employment, representing a catastrophic net economic loss for the community.

7. VIOLATION OF THE AARHUS CONVENTION & FLOUTED COMMUNITY ENGAGEMENT

The developer's approach to public consultation was a superficial, "tick-box" exercise that completely failed to meet the standards mandated by both Irish planning frameworks and international law.

Evading the Community: The appointed project representatives (Tom Costello and Eamon Keaveny) did not initiate open dialogue. On multiple occasions, they drove up our lane, dropped a leaflet through the door, and attempted to drive off immediately. Our direct communication only occurred because we physically ran out the door to stop them to ask basic questions, including requests for a public meeting. Our pressing concerns were brushed aside, being told that the meeting was already done so its going in for planning soon. Basically a whether you like it or not attitude.

Breach of the National Code of Practice (2016): The Department of Environment, Climate and Communications' Code of Practice for Wind Energy Development in Ireland on Community Engagement explicitly mandates that developers ensure "early, accessible, transparent, and meaningful consultation" with a continuous feedback loop. Treating a hasty, forced driveway interaction as "consultation" directly violates this national framework.

One public meeting was held in a rural community centre by appointment only. Does this realistically speak to engagement with the community? By using this means of 'engagement' it has in turn emphasised the dominance the developer has, with the local people feeling they have no control over what their future holds.

8. THE MYTH OF A "JUST TRANSITION"

The European Union's own green transition policies explicitly demand a "Just Transition" that protects citizens and ensures no community is left behind or unfairly burdened.

Pushing rural families into the shadow of industrial monstrosities that cause visual dominance, shadow flicker, and chronic anxiety completely violates the spirit of a fair transition. An Coimisiún Pleanála has a duty of care to protect the residential amenity and mental well-being of Irish citizens. Green energy targets should be met through offshore wind development or appropriately sited projects that are in line with their surrounding environment, not by sacrificing the health and future of the people of North Leitrim.

CONCLUSION & FORMAL REQUEST

In light of the severe and unmitigable impacts on our residential amenity, the clear material contraventions of the Leitrim County Development Plan, the environmental threats to local SACs and water tables, the immediate destruction of a vital carbon sink, and the clear breaches of the Aarhus Convention, we respectfully request that An Coimisiún Pleanála REFUSE planning permission for the Lissinagroagh Wind Farm.

Signed:

Joanne Fox

Noel Fox

Date: July 10, 2026